From: John Hebert
To: Jennifer Gaines; Bill Jacobs
Subject: Re: Fw: Bait Station Prototype
Date: 07/23/2009 05:06 PM

Jen/Bill, OK - thanks for the explanation. I agree with you that these reviews are worthwhile.

john

▼ Jennifer Gaines---07/23/2009 08:08:32 AM---I have no problem with looking at the prototypes, I agree that looking at the prototypes is the easi

From: Jennifer Gaines/DC/USEPA/US
To: John Hebert/DC/USEPA/US@EPA
Cc: Bill Jacobs/DC/USEPA/US@EPA, Dan Peacock/DC/USEPA/US@EPA, Meredith Laws/DC/USEPA/US@EPA
Date: 07/23/2009 08:08 AM
Subject: Re: Fw: Bait Station Prototype

I have no problem with looking at the prototypes, I agree that looking at the prototypes is the easiest way to suggest ways to make better products. We may see problems that they overlook or don't think about. When Bill and I looked at the two stations, it didn't take up too much time and I thought it was rather interesting to see what they thought would pass as a tier II.

Jennifer Gaines
Wildlife Biologist
U.S. Environmental Protection Agency
Insecticide-Rodenticide Branch
Registration Division (7505P)

Tel: 703 305-5967
Fax: 703 305-6309

▼ John Hebert---07/22/2009 08:09:19 PM---Bill/Jennifer - thanks for responding. Do you think that it's worth the time and effort to throughl

From: John Hebert/DC/USEPA/US
To: Bill Jacobs/DC/USEPA/US@EPA
Cc: Dan Peacock/DC/USEPA/US@EPA, Jennifer Gaines/DC/USEPA/US@EPA, Meredith Laws/DC/USEPA/US@EPA
Date: 07/22/2009 08:09 PM
Subject: Re: Fw: Bait Station Prototype

Bill/Jennifer - thanks for responding. Do you think that it's worth the time and effort to throughly review stations that are so early in the design stage? These were obviously flimsy and clearly would not meet anything but the Tier IV criteria. I'm asking because we may start seeing a lot more of these prototypes. But if it really doesn't take much of your time, it might not make much difference.

John

-----Bill Jacobs/DC/USEPA/US wrote: -----

To: John Hebert/DC/USEPA/US@EPA, Dan Peacock/DC/USEPA/US@EPA
From: Bill Jacobs/DC/USEPA/US
Date: 07/22/2009 04:10PM
Subject: Fw: Bait Station Prototype

----- Forwarded by Bill Jacobs/DC/USEPA/US on 07/22/2009 04:10 PM -----

From: Bill Jacobs/DC/USEPA/US

To: "Jenny Seifert" <jseifert@neogen.com>

Date: 07/22/2009 04:09 PM

Subject: RE: Bait Station Prototype

We have examined the two prototype mouse-sized bait stations that you submitted on April 27, 2009. For convenience, we will refer to the unit with the transparent top and the sprung slide arrangement designed to close off the bait compartment if the station is lifted as the "slide" model and to the other unit as the "all-gray" model.

In your letter, you state that you believe that both of the units would meet the "Tier II" criteria indicated in EPA's rodenticide risk mitigation decision of May, 2008. You also note that the prototypes supplied were constructed of "materials ... not as strong as the final materials" presumably to be used for production models. To qualify for Tier 2, ready-to-use rodenticide stations must be shown to resist tampering efforts by dogs and by young children in the age range use to test child-resistant packaging (42-51 months). Tier 2 stations are to be labeled for indoor use only.

As your letter of April 27, 2009, addressed each of the 8 criteria for

tamper-resistant bait stations with regard to your prototypes, we follow that format in our reply.

Criterion 1

As noted below and by you, the prototypes were not constructed of strong materials. Whether weather would weaken those materials further could be discussed, but the weather-resistance criterion does not apply to Tier 2 stations because their labels prohibit outdoor use.

Criterion 2

The prototypes seemed highly unlikely to withstand efforts by children and dogs to break the stations. Although stronger materials of construction could improve this situation, especially with respect to young children, some design changes may be in order.

Applying what seemed to us to be relatively gentle forces, we broke both units at points associated with their locking mechanisms and also pushed a thumb through the top of the all-gray model at its thinnest point.

Criterion 3

Both units have locking mechanisms, but both mechanisms were compromised through our manipulations. In both cases, lifting up on the lid of the station at or slightly in front of the rodent entrances created forces sufficient to break the top of the all-gray model at its locking (screw-in) point and to separate the screw housing from the base of the slide unit. The main problem is the relatively long span between the top's rear attachment (presumably to be achieved via a "living hinge" rather than clear tape on production models) and the single locking point at the front of the station. Having two or more locking points or fully nesting the station's top into its base could address the span problem. However, the fact that the top of the unit also is the top of the rodent entrance would mean that it still would be easy to pull upward on the top of the station even if it were nested in the base elsewhere.

On the slide unit, It might be possible to shorten the length of the span between the front locking mechanism and the hinge by moving the hinge location forward by extending the dark gray portion (molded with the base) up over the top of the station and having it end above the sliding arm. At that point, the hinge could be created so only the front part of the top of the unit could be lifted. Making this alteration also would allow for strengthening the rodent entrance area and reducing the size of the opening (see below). This change also would allow you to add a solid piece of plastic over the sliding sleeve to keep in on track better when the sleeve is slid into place, thereby improving the reliability of the slide's performance. Additional locking points also could be added to the now-smaller moveable lid. With the lid no longer being above the rodent entrances, children and pets would be deprived of the ability to tug upward on the lid at the entrances. The